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IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
AMARILLO DIVISION

In Re:	§	
	§	
McClain Feed Yard, Inc.,	§	Case No. 23-20084-rlj-7
	§	
<i>Debtor.</i>	§	
	§	

**MOTION FOR EXTENSION OF TIME TO FILE BANKRUPTCY SCHEDULES AND  
STATEMENT OF FINANCIAL AFFAIRS**

TO THE HONORABLE ROBERT L. JONES, Bankruptcy Judge:

NOW COMES, McClain Feed Yard, Inc., Debtor in the above referenced bankruptcy proceeding ("Debtor"), and file this their *Motion for Extension of Time to File Bankruptcy Schedules and Statement of Financial Affairs*, and in support thereof would respectfully show unto the Court as follows:

1. The Debtor filed for relief under Chapter 7 of the United States Bankruptcy Code on April 28, 2023.
2. Bankruptcy Rule 1007( c) requires the Debtor to file its schedules, statement of financial affairs, and other documents required by Bankruptcy Rule 1007(b) within 14 days after the entry of the order for relief, unless the Court orders otherwise.
3. Since the filing of the Petition, the Debtor and their attorney have attempted to work on completion of the Bankruptcy Schedules. This process has been difficult since the manager of this corporation committed suicide within weeks before the case was filed. Moreover, due to the volume of information still needed to complete these documents, the Debtor's Bankruptcy filing documents will not

be ready for filing by the original deadline. The Debtor's restructuring office, Glenn Karlberg, and the Debtor's attorney will continue to work on the Bankruptcy documents in an effort to complete them on or before the extension period requested.

4. Therefore, Debtor would request that the deadline to file the above-stated documents be extended to June 7, 2023.

5. Debtor assert that the requested extension of time is made in good faith and is not requested to cause delay, fraud or hindrance.

WHEREFORE, PREMISES CONSIDERED, the Debtor pray that the Court grant it an extended deadline of June 7, 2023 to file the above-stated documents Bankruptcy Schedules, and pray for such other and further relief as the Court may deem necessary and proper.

Dated: May 10, 2023

Respectfully submitted,

TARBOX LAW, P.C.  
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806/686-4448; 806/368-9785 (FAX)

By: /s/ Max R. Tarbox  
Max R. Tarbox  
State Bar No. 19639950  
*Attorney for the Debtor*

#### **CERTIFICATE OF CONFERENCE**

I do hereby certify that on May 9, 2023, my office reached out to Lisa Lambert, Assistant United States Trustee, and Kent Ries by phone, concerning an extension of time for the Debtors to file their Bankruptcy Schedules and Statement of Financial Affairs. Ms. Lambert agreed to the extension of time but stated she would defer to Mr. Ries's position. Mr. Ries stated he would agree to the extension date requested by the Debtor.

/s/ Max R. Tarbox  
Max R. Tarbox

**CERTIFICATE OF SERVICE**

I do hereby certify that a true and correct copy of the foregoing *Motion* was served by either court enabled electronic service or regular first class U. S. Mail upon the following listed parties on this 10<sup>th</sup> day of May, 2023:

1. U. S. Trustee's Office  
RM 976, 1100 Commerce Street  
Dallas, Texas 75242
2. Glenn Karlberg  
15029 N. Thompson Peak Pkwy  
No. B111-643  
Scottsdale, AZ 85267  
gkarlberg@ampleo.com
3. All parties in interest registered with the  
U. S. Bankruptcy Court to receive electronic  
notices in this case.
4. All parties listed on the attached matrix.

/s/ Max R. Tarbox

Max R. Tarbox